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7 *Attorneys for GOOGLE LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. NO. 158)**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
5 Declaration, and if called as a witness I would testify competently to those matters

6 2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to
7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No.
8 158) filed in connection with Sonos’s Motion for Leave to File an Amended Answer (“Motion to
9 Amend”) (Dkt. No. 157). If called as a witness, I could and would testify competently to the
10 information contained herein.

11 3. Google seeks an order sealing the materials as listed below:

Document	Portions Google Seeks to Be Filed Under Seal	Designating Party
Exhibit 1 to the Declaration of Cole B. Richter in Support of Sonos’s Motion to Amend (“Exhibit 1”)	Portions highlighted in green	Google

16 4. I understand that the Court applies a “compelling reasons” standard to a sealing request
17 made in connection with an answer to a complaint. *See, e.g., VLSI Tech. LLC v. Intel Corp.*, No. 17-
18 CV-05671-BLF, 2021 WL 6063965, at *1 (N.D. Cal. Dec. 22, 2021); *Delfino Green & Green v.*
19 *Workers Compensation Sols., LLC*, No. 15-CV-02302-HSG, 2015 WL 4235356, at *2 (N.D. Cal. July
20 13, 2015).

21 5. The portions of Exhibit 1 highlighted in green on pages 13 and 14 contain references to
22 Google’s confidential business information and trade secrets, including details regarding the
23 architecture, technical operation, and work flow strategies and processes of Google’s products. The
24 specifics of how these functionalities operate and were developed is confidential information that
25 Google does not share publicly. Thus, I understand that the public disclosure of such information
26 could lead to competitive harm to Google as competitors could use these details regarding the
27 architecture and functionality of Google’s products to gain a competitive advantage in the marketplace
28 with respect to their competing products. A less restrictive alternative than sealing would not be

